

Dorothy Lawrence
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ATTORNEY FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:

GERALD GLEN MOSELEY
MARIA SALDIVAR MOSELEY

Debtors

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Case No.: 24-11376
Chapter 13

DEBTOR'S MOTION TO TRANSFER FUNDS

These pleading requests relief that may be adverse to your interests.

If no timely response is filed within 21 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COME NOW GERALD GLEN MOSELEY AND MARIA SALDIVAR MOSELEY, (the “Debtors”) move the Court for order authorizing funds to transfer from Arlice Harris account [24-11375] to Gerald Glen Moseley and Maria Saldivar Moseley’s Account [24-11376] and would respectfully show the Court as follows:

1. Debtors commenced this bankruptcy case on October 31, 2024, with a Chapter 13 petition under the United States Bankruptcy Court for the Western District of Texas.

2. Debtors first Chapter 13 plan payment was due on November 30, 2024.

Debtors sent in multiple payments via TFS online payment portal. However, the trustee’s office did not receive the payments. After reviewing the case further, it appears that the Debtors used an

incorrect MoneyGram card in error. The debtor is already aware of the error and will be using the correct MoneyGram card information moving forward.

3. Due to this error, funds were deposited into the Arlice Patricia Harris (24-11375) account with the office of the Standing Chapter 13 Trustee.

4. The Debtors case is in jeopardy of being dismissed for non-payment due to a deficiency of \$400. However, the two payments that were made as Transaction 17735018 and Transaction 17384877, total of \$400.00. These two payments are the payments that were improperly coded.

5. Debtors request that the \$400.00 funds be transferred from Alice Patricia Harris (24-11375) account to the Debtors' account (24-11376)

WHEREFORE PREMISES CONSIDERED, the Debtors respectfully requests that this Court enter an order authorizing the transfer of funds from the Arlice Patricia Harris (24-11375) account to Maria Moseley (24-11376) account.

Dated: January 27, 2025

Respectfully submitted,

/s/ Dorothy Lawrence
Dorothy Lawrence
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ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I certify that I sent copy of the foregoing document via ECF or via first class United States mail on January 27, 2025, to the parties on the attached matrix:

DEBTORS:

Gerald Glen Moseley
Maria Saldivar Moseley
1412 Strickland Drive
Austin, Texas 78748

CHAPTER 13 TRUSTEE:

Debbie Langehennig
PO Box 91419
Austin, Texas 78709

U.S. TRUSTEE

Office of The United States Trustee
903 San Jacinto Blvd, Room 230
Austin, TX 78701

/s/ Dorothy Lawrence
Dorothy Lawrence
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